

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

STEPHAN FLEMENS and GEORGE JONES,  
on behalf of themselves and all others similarly situated,  
JOSE RODRIGUEZ, WAI YUN AU,  
MICHAEL WILLIAMS, and NORMAN FORBES,  
Individually,

Plaintiffs,

- against -

THE ANTHEM COMPANIES, INC., THE ANTHEM  
COMPANIES INDIANA, AMERIGROUP NEW YORK,  
LLC, d/b/a AMERIGROUP, and AMERIGROUP IPA OF  
NEW YORK, LLC, d/b/a AMERIGROUP,

Defendants.

Civil Action No.: 1:17-CV-  
07088-AMD-RER

**STIPULATION FOR AN  
EXTENSION OF TIME FOR  
DEFENDANTS TO ANSWER  
OR OTHERWISE RESPOND  
TO PLAINTIFFS'  
COMPLAINT**

Plaintiffs Stephan Flemens and George Jones, on behalf of themselves and all others similarly situated, and Jose Rodriguez, Wai Yun Au, Michael Williams, and Norman Forbes, individually (collectively "Plaintiffs"), and The Anthem Companies, Inc., The Anthem Companies Indiana, Amerigroup New York, LLC, d/b/a Amerigroup, and Amerigroup IPA of New York, LLC, d/b/a Amerigroup (collectively "Defendants"), by and through their respective undersigned counsel, and pursuant to Rule II.C. of the Individual Practice Rules of Magistrate Judge Ramon E. Reyes, Jr., hereby submit this joint stipulation for an extension of time, until February 9, 2018, for Defendants to answer, move or otherwise respond to Plaintiffs' Collective Action Complaint (the "Complaint"). In support of this stipulation, the parties represent that:

1. Defendants' responsive pleading deadline is currently January 10, 2018.
2. This is Defendants' first request for an extension of time to respond to the Complaint.
3. This extension is requested to allow Defendants to investigate and fully respond to the Complaint.

4. On January 2, 2018, the parties conferred regarding this joint stipulation.
5. There are no status conferences or hearings scheduled that will be affected by this joint stipulation.
6. This joint stipulation is filed in good faith and not for the purpose of unwarranted delay.

WHEREFORE, the parties respectfully request that the Court issue an order granting Defendants until February 9, 2018 to answer, move or otherwise respond to Plaintiffs' Complaint.

DATED: January 5, 2018

Respectfully submitted,

By: /s/ Saranicole A. Duaban  
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***Attorneys for Defendants***

IT IS SO ORDERED,

This \_\_\_\_ day of \_\_\_\_\_, 2018

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HON. RAMON E. REYES, JR.  
UNITED STATES MAGISTRATE JUDGE